

Omnibus Hearing Date and Time: January 5, 2006 @ 10:00 a.m.
Objection Deadline Date and Time: January 2, 2006 @ 4:00 p.m.

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ATTORNEYS FOR APPALOOSA
MANAGEMENT L.P.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)	
In re)	Chapter 11
)	
Delphi Corporation, <u>et al.</u>)	Case No. 05-44481
)	Jointly Administered
Debtors.)	
)	

**NOTICE OF MOTION OF APPALOOSA MANAGEMENT L.P.
PURSUANT TO 11 U.S.C. § 1102(a)(2) FOR AN ORDER
DIRECTING THE UNITED STATES TRUSTEE TO APPOINT AN
EQUITY COMMITTEE IN THESE CHAPTER 11 CASES**

PLEASE TAKE NOTICE that on December 22, 2005, Appaloosa Management L.P., collectively with and through certain of its affiliates, one of Delphi Corporation's ("Delphi") largest shareholders, owning beneficially approximately 9.3% of Delphi's issued and outstanding shares, by and through its undersigned counsel, filed the motion (the "Motion") for entry of an order pursuant to 11 U.S.C. § 1102(a)(2) directing the United States Trustee for the Southern District of New York to appoint an

official committee of equity security holders to serve in the above-captioned jointly administered cases of Delphi and its affiliated debtors and debtors in possession.

PLEASE TAKE FURTHER NOTICE that a hearing to consider approval of the Motion will be held on January 5, 2006, at 10:00 a.m. (Prevailing Eastern Time) before the Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 610, New York, New York, 10004.

PLEASE TAKE FURTHER NOTICE that objections, if any, to approval of the Motion (a) must be in writing, (b) must conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the Order Under 11 U.S.C. §§ 102(1) And 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, And 9014 Establishing (I) Omnibus Hearing Dates, (II) Certain Notice, Case Management, And Administrative Procedures, And (III) Scheduling An Initial Case Conference In Accordance With Local Bankr. R. 1007-2(e) dated October 14, 2005 (the “Case Management Order”) (Docket No. 245), (c) must be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended), (d) must be submitted in hard-copy form directly to the chambers of the Honorable Robert D. Drain, United States

Bankruptcy Judge and (e) must be served in accordance with the Case Management

Order so as to be **received** no later than **4:00 p.m. (Prevailing Eastern Time)** on

January 2, 2006.

Dated: December 22, 2005
Miami, Florida

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By: /s/ John K. Cunningham
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